

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

SHIRLEY PARROTT-COPUS

Plaintiff,

-vs-

TERRA STATE COMMUNITY
COLLEGE,

Defendant.

:
:
: Case No. 3:15-CV-01753-JZ
:
: JUDGE ZOUHARY
:
:
:
: JURY DEMAND
:
:
:
:

OFFER OF JUDGMENT

To: Shirley Parrott-Copus, Plaintiff, and Mary C. Vargas, Esq. and Stephen M. Dane, Esq.,
Counsel for Plaintiff

Pursuant to Fed. R. Civ. P. 68, Terra State Community College, Defendant in the above-captioned action, makes the following offer of judgment to Plaintiff Shirley Parrott-Copus:

1. A judgment in favor of Plaintiff and against Defendant for Fifty-Thousand Dollars (\$50,000.00) in full satisfaction of any and all damages relating to any and all of Plaintiff's claims, legal or equitable, in her lawsuit, and any and all claims for sought-after relief.
2. A judgment in favor of Plaintiff and against Defendant for Twenty-Five Thousand Dollars (\$25,000.00) in full satisfaction of all costs, expenses, and attorneys' fees incurred and/or accrued by Plaintiff to date of this offer in connection with this action.

This Offer of Judgment shall not be interpreted as exceeding the sum total of Seventy-Five Thousand Dollars, inclusive of all relief for Ms. Parrott-Copus, legal and equitable, and all costs, expenses and attorney's fees.

Pursuant to Fed. R. Civ. P. 68, Plaintiff has 14 days from service of this offer to accept it in writing.

Respectfully submitted,

MICHAEL DEWINE (0009181)
Ohio Attorney General



MICHAEL C. MCPHILLIPS (0065329)
JEFFREY A. KNIGHT (0086649)
Assistant Attorneys General
Education Section
30 East Broad Street, 16th Floor
Columbus, Ohio 43215
Telephone: (614) 644-7250
Facsimile: (614) 644-7634
michael.mcphillips@ohioattorneygeneral.gov
jeffrey.knight@ohioattorneygeneral.gov

Counsel for Defendant

CERTIFICATE OF SERVICE

This certifies that on November 13, 2015, the foregoing Offer of Judgment was served by certified mail and electronic mail upon the following:

Mary C. Vargas, Esq.
Stein & Vargas, LLP
5100 Buckeystown Pike, Suite 250
Fredrick, MD 21704
Mary.vargas@steinvargas.com

Stephen M. Dane, Esq.
Relman, Dane & Colfax PLLC
312 Louisiana Avenue
Perrysburg, OH 43551
sdane@relmanlaw.com



MICHAEL C. MCPHILLIPS (0065329)
Assistant Attorney General